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9 Attorneys for Defendant,
SEAGATE TECHNOLOGY LLC

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14 IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

Case No. 3:16-cv-00523-JCS

15 CONSOLIDATED ACTION

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE THE MARCH 15,
2019 CASE MANAGEMENT
CONFERENCE AND EXTEND THE
DEADLINE TO FILE A JOINT CASE
MANAGEMENT STATEMENT**

24 This Joint Stipulation is made by and between Plaintiffs and Seagate Technology LLC
25 (“Seagate,” and together with Plaintiffs, the “Parties”), by and through their respective
26 undersigned counsel of record, with reference to the following facts:
27
28

RECITALS

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2 1. WHEREAS, Plaintiffs filed a renewed motion for class certification (“Motion”) on
3 October 15, 2018 (Dkt. 189);

4 2. WHEREAS, the Court denied Plaintiffs’ Motion on January 22, 2019 (Dkt. 200);

5 3. WHEREAS, the Court instructed the parties “to meet and confer regarding a plan to
6 resolve or try Plaintiffs’ individual claims.”

7 4. WHEREAS the Court had ordered the parties to file a joint case management
8 statement (“Joint CMC Statement”) no later than February 22, 2019 (*id.*);

9 5. WHEREAS, the Court had further ordered that a case management conference
10 (“CMC”) be held on March 1, 2019 at 2:00 pm (*id.*);

11 6. WHEREAS, on February 21, 2019, pursuant to a stipulation of the Parties, the
12 Court ordered that the CMC be continued until March 15, 2019 at 2:00 pm and the deadline for the
13 parties to file the Joint CMC Statement be extended until March 8, 2019 (Dkt. 210);

14 7. WHEREAS the parties are working diligently to negotiate a potential resolution of
15 Plaintiffs’ individual claims, and therefore require additional time to prepare and submit the Joint
16 CMC Statement and prepare for the CMC;

17 8. WHEREAS, the Parties have agreed, subject to the Court’s approval and
18 availability, that the CMC be continued until March 29, 2019, or the earliest available date
19 thereafter; and

20 9. WHEREAS, the Parties have agreed, subject to the Court’s approval, that the
21 deadline to file the Joint CMC Statement be extended until March 22, 2019.

STIPULATION

22
23 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
24 BETWEEN THE PARTIES that, subject to the Court’s approval and availability:

25 (1) the Case Management Conference presently calendared for March 15, 2019 at 2:00 pm
26 be continued until March 29, 2019 at 2:00 pm; and

27 (2) the deadline for the parties to file a joint case management statement be extended until
28 March 22, 2019.

1
2 Dated: March 7, 2019

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3
4 By /s/ Neil A.F. Popović
NEIL A.F. POPOVIĆ

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6 Attorneys for Defendant
SEAGATE TECHNOLOGY LLC

7 I, Neil A.F. Popović, whose user ID and password are used to efile this document, hereby attests
8 that, pursuant to Local Rule 5.1(i)(3), concurrence in this filing was obtained from each of the
other Signatories, in lieu of each's signature.

9
10 Dated: March 7, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

11
12 By /s/
STEVE W. BERMAN

13
14 Attorneys for Plaintiffs

15
16 Dated: March 7, 2019

AXLER GOLDICH LLC

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18 By /s/
MARC A. GOLDICH (*Pro Hac Vice*)

19
20 Attorneys for Plaintiffs

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22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23
24 Dated: March 12, 2019

25
26 The Honorable Joseph C. Spero
Chief Magistrate Judge

